



5-106.15

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD 1009
LOG * 2522
SEP 25 11 10 AM '97

SEP 24 1997

FILE: 5412
REPLY TO THE ATTENTION OF:

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Final IEMP

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) final Integrated Environmental Monitoring Plan (IEMP).

U.S. DOE has adequately addressed U.S. EPA's previous comments via a June 25, 1997, conference call and subsequent submittal of a June 30, 1997, facsimile. U.S. EPA approved the responses in a letter dated July 10, 1997. However, in reviewing the final document it appears some comments were not incorporated into the final document as specified in the Response To Comments (RTC).

The following changes need to be made to the final document.

- Three wells have not been added to the list of groundwater elevation monitoring wells on page 3-50 of the final IEMP, as proposed in U.S. DOE's RTC No. 5. The missing wells are 3426, 31565, and 3648.
- Proposed language providing clarification on the terms "ASL B" and "ASL D" has not been added to Section 6, as proposed in U.S. DOE's RTC No. 9.
- Revised language has not been incorporated into the final IEMP as proposed in U.S. DOE's RTC No. 16. The revised language, which addresses quality assurance protocols for evaluating replicate data was provided in a facsimile dated June 30, 1997, and approved in the July 10, 1997 U.S. EPA letter. Also, the term "standard deviation (at 95%)" on pages 6-30 and 6-31 of the final IEMP is unclear.
- The final IEMP must be revised so that footnote "e" of Figure 6-8 is moved from "Annual Comprehensive Report" and placed after footnote "d" in "Quarterly Reports/Meetings (to start December 19977)."

-2-

- The revisions to pages 6-42 and 6-44 proposed in U.S. DOE's RTC No. 22 have not been modified to include the phrase "radiological air particulate monitoring" as discussed during a June 25, 1997, conference call.
- Lines 17 through 19 on page C-15 should be deleted as proposed by U.S. DOE's RTC No. 23.

U.S. DOE must submit change pages incorporating the above corrections within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Charles Little, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO